



March 14, 2019

Via www.regulations.gov and email

U.S. Environmental Protection Agency
Attention Docket ID Number EPA-HQ-OAR-2018-0853
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Docket ID No. EPA-HQ-OAR-2018-0853 – “Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2017,” 84 Fed. Reg. 3,444 (Feb. 12, 2019)

Dear Docket Clerk:

The Interstate Natural Gas Association of America (INGAA), a trade association of the interstate natural gas pipeline industry, respectfully submits these comments in response to the Environmental Protection Agency’s (EPA) notice of document availability and request for comments on the draft, “Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2017” (Draft Inventory Report). EPA requests recommendations for improving the overall quality of the inventory report to be finalized in April 2019, as well as subsequent inventory reports.

INGAA is comprised of 28 members, representing the vast majority of the U.S. interstate natural gas transmission pipeline companies. INGAA’s members operate nearly 200,000 miles of pipelines. INGAA’s members have reported greenhouse gas (GHG) emissions under Subpart W of EPA’s Greenhouse Gas Reporting Rule (GHGRP) since 2011. The Draft Inventory Report proposes updates for estimating blowdown emissions from transmission pipelines based on GHGRP data.

In November 2018, EPA released a document¹ (the “November 2018 memo”) describing potential updates to the annual inventory report, including proposed updates to the methane emission factor for transmission pipeline blowdowns based on 2016 data submitted under Subpart W of the GHGRP. EPA amended Subpart W to add reporting of transmission pipeline blowdown emissions by event type, and 2016 was the first reporting year. EPA was made aware of several issues regarding the November 2018 memo: erroneous data reported by one company in 2016 significantly affected the pipeline blowdown emission factor; the company had corrected the error and updated 2016 data were available; and, 2017 GHGRP data were also available for consideration. In the Draft Inventory Report, EPA addressed this problem by developing a transmission pipeline blowdown emission factor that averages the Subpart W data from 2016 and 2017, and applied the emission factor for the entire time series. EPA requested feedback on whether year-specific emission factors should be applied for 2016 and 2017, and whether the current emission factors should be applied for earlier years of the time series.

INGAA welcomes EPA’s efforts to utilize data from Subpart W to improve methane emission estimates in the annual inventory report for the natural gas transmission and storage sector.

¹ “Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2017: Other Updates Under Consideration,” U.S. EPA (November 2018).

However, INGAA recommends alternatives for applying the 2016 and 2017 pipeline blowdown data and for subsequent annual inventory reports. INGAA's review of the historical / previous emission factor used for the annual inventory and more current data indicates that an emission factor based on 2016 Subpart W pipeline blowdown data is marginally higher than the previous emission factor, while an emission factor based on 2017 Subpart W pipeline blowdown data is approximately the same as the previous factor. Details are not provided in the Draft Inventory Report, but a summary based on INGAA's review indicates:

- The November 2018 memo presents the previous pipeline blowdown emission factor: 0.6 metric tons (mt) methane per mile of pipe (mt/mi).
- The November 2018 memo proposed increasing the emission factor to 1.2 mt/mi, but this emission factor included the erroneous 2016 data.
- The Draft Inventory Report proposes to average the 2016 corrected data and 2017 data, and INGAA's review indicates that emission factor is 0.72 mt/mi.
- The emission factor based on 2017 data is 0.61 mt/mi.
- The emission factor based on 2016 data is 0.84 mt/mi.
- The event-specific information indicates that 2016 Subpart W data showed higher emissions and events than 2017 data for new construction or modification (including commissioning) and equipment replacement or repair. Higher emissions from those event types may not be typical or representative of other years.

In response to EPA's request and in light of the differences in 2016 and 2017 data, INGAA recommends using year-specific emissions for 2016 and 2017, and applying the historical/previous emission factor for the earlier years in the time series. The resulting time series would show a one-year increase in emissions in 2016 and similar emissions for other years. Alternatively, EPA could refrain from updating the emission factor in the 2019 inventory report, gather an additional year of Subpart W data, and update the transmission pipeline blowdown emission factor and emission estimates in the 2020 annual inventory report. The third year of Subpart W data (for 2018) could provide insight regarding year-to-year variability and whether any data appears to be anomalous. For example, data quality associated with the first year of reporting (or higher than typical construction and equipment replacement events) could indicate that 2016 is not representative of typical natural gas transmission pipeline operations.

INGAA appreciates your consideration of these comments. Please contact me at 202-216-5955 or ssnyder@ingaa.org if you have any questions. Thank you.

Sincerely,



Sandra Y. Snyder
Regulatory Attorney for Environment & Personnel Safety
Interstate Natural Gas Association of America

cc: Mausami Desai, U.S. EPA (via email)
Melissa Weitz, U.S. EPA (via email)